

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**TALIA N. HARRISON,**

**Plaintiff,**

**VS.**

**TYLER TECHNOLOGIES, INC.,**

**Defendant.**

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**No. 4:21-cv-00607-ALM**

## UNOPPOSED MOTION TO MODIFY SCHEDULING ORDER

Defendant Tyler Technologies, Inc. (“Defendant” or “Tyler”) respectfully moves the Court to modify the Scheduling Order [ECF 10], and would respectfully show the Court as follows:

## I. PROCEDURAL HISTORY

1. This civil action was commenced by Plaintiff Talia N. Harrison (“Plaintiff”) on August 3, 2021, by the filing of her Complaint. [ECF 1].

2. An Order governing proceedings was entered by the Court on September 15, 2021, which set the final pretrial conference for September 1, 2022.

3. The Scheduling Order was entered by the Court on November 1, 2021 [ECF 10], which set forth various deadlines for the disposition of the case, including discovery, disclosures and the filing of dispositive motions.

4. On February 10, 2022, Defendant filed its motion for summary judgment in accordance with the Scheduling Order. [ECF 14].

5. On March 3, 2022, Plaintiff filed a response to the motion for summary judgment. [ECF 15].

6. On March 10, 2022, Defendant filed a reply in support of its motion for summary judgment. [ECF 16].

7. On April 21, 2022, discovery was set to close per the Scheduling Order. *See* [ECF 10].

8. On April 20, 2022, Plaintiff filed an unopposed motion to extend discovery for seven (7) days to allow the Parties to confer on Plaintiff's motion to compel discovery. [ECF 17].

9. On April 28, 2022, Plaintiff filed a motion to compel discovery. [ECF 19].

10. On May 13, 2022, the Parties held a discovery conference with the Court on Plaintiff's motion to compel discovery. As a result of the conference, the Court ordered Defendant to supplement its discovery responses; the Parties to submit a protective order; Plaintiff to serve amended discovery requests; the Parties to confer on a methodology for sampling of certain documents; and that good cause existed for Plaintiff to be permitted to file a new response to Defendant's motion for summary judgment and Defendant be permitted to file a reply to Plaintiff's new response. *See* 5/13/22 Minute Entry.

11. On May 20, 2022, the Parties filed an agreed protective order. [ECF 21].

12. On May 26, 2022, Defendant supplemented its discovery responses per the Court's order.

13. On May 27, 2022, Plaintiff served her amended discovery request, which Defendant timely responded to on June 27, 2022.

14. The Parties continue to confer regarding the methodology for sampling certain documents.

15. In accordance with the Scheduling Order, certain pretrial filings are due beginning July 21, 2022 and the final pretrial conference is scheduled for September 1, 2022. *See* [ECF 10].

## **II. REQUEST FOR EXTENSION**

16. In order to allow the Parties adequate time to finish discovery and to brief summary judgment, Defendant requests that the Scheduling Order be modified so that the following dates shall apply:

August 26, 2022:	Plaintiff's deadline to file response to Defendant's Motion for Summary Judgment
September 9, 2022:	Defendant's deadline to file its reply in support of its Motion for Summary Judgment
January 12, 2023:	Deadline to offer certified records
January 19, 2023:	Deadline to file video deposition designations
January 24, 2023:	Deadline to file final pretrial order
February 9, 2023:	Deadline to file responses to motions in limine; deadline to file objections to witnesses, deposition excerpts, and exhibits
February 23, 2023:	Final pretrial conference

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests an order modifying the Scheduling Order as described above.

Dated: July 13, 2022

Respectfully submitted,

/s/ Amanda E. Brown

Paulo B. McKeeby

TX State Bar No. 00784571

pmckeeby@reedsmith.com

Amanda E. Brown

TX State Bar No. 24087839

aebrown@reedsmith.com

Reed Smith LLP

2850 N. Harwood St., Suite 1500

Dallas, TX 75201

Telephone: +1.469.680.4200

Facsimile: +1.469.680.4299

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 13, 2022, a true and correct copy of the above was filed using the Court's CM/ECF system that caused notice to be served upon the following:

Charles R. Bridgers  
Matthew W. Herrington  
DeLong Caldwell Bridgers Fitzpatrick &  
Benjamin, LLC  
101 Marietta St.  
Ste. 2650  
Atlanta, GA 30303  
charles.bridgers@dcbflegal.com  
matthew.herrington@dcbflegal.com

Melinda Arbuckle  
Shellist Lazarz Slobin LLP  
11 Greenway Plaza  
Suite 1515  
Houston, TX 77046  
marbuckle@eeoc.net

/s/ Amanda E. Brown  
Amanda E. Brown

**CERTIFICATE OF CONFERENCE**

On the 13<sup>th</sup> day of July, 2022, counsel for Defendant conferred with counsel for Plaintiff regarding the relief requested in this Motion. Plaintiff's counsel advised that Plaintiff is not opposed to the relief sought therein.

/s/ Amanda E. Brown  
Amanda E. Brown